

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

COMITÉ PROGRESO DE LAMONT, *et al.*,

Plaintiffs,

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, *et al.*,

Defendants.

Civ. No. 4:21-cv-08733-DMR

**STIPULATION AND [PROPOSED]
ORDER TO ENLARGE TIME FOR
DEFENDANTS' ANSWER AND TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Plaintiffs Comité Progreso de Lamont, Committee for a Better Arvin, Committee for a Better Shafter, Central California Environmental Justice Network, Association of Irrigated Residents, Medical Advocates for Healthy Air, National Parks Conservation Association, and Sierra Club and Defendants United States Environmental Protection Agency ("EPA") and Michael S. Regan, Administrator of the EPA (collectively, the "Parties") stipulate as follows:

1. The Parties met and conferred on December 10, 2021. During that meeting, the Parties agreed to pursue settlement options and, in that vein, ask this Court for an extension of the litigation deadlines in this case.

2. The Parties further agreed that an extension of litigation proceedings would be beneficial to the Parties and conserve efficient use of the Court's resources while the Parties seek to negotiate a resolution to this case.

3. There have been no previous time modifications in this case.

4. Plaintiffs filed their complaint on November 10, 2021 and completed service on November 15, 2021, such that Defendants' response is currently due on January 14, 2022. *See* Dkt. No. 1. The parties request that Defendants' response deadline be extended 30 days to February 14, 2022.

5. The Case Management Conference for this case is currently scheduled for February 16, 2022 at 1:30 P.M. Dkt. No. 5. The Parties request that the Court continue the Conference at the Court's earliest convenience on or after March 30, 2022.

6. This Court set January 26, 2022, 21 days before the Case Management Conference, as the last day to meet and confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan, and to file an ADR certification. *Id.* The Parties request that the Court extend these deadlines to 21 days before the rescheduled Case Management Conference.

7. This Court set February 9, 2022, 7 days before the Case Management Conference, as the deadline to file a Rule 26(f) Report, complete initial disclosures or state an objection in a Rule 26(f) Report, and file a Case Management Statement. *Id.* The Parties request that the Court extend these deadlines to 7 days before the rescheduled Case Management Conference.

8. The Parties respectfully request this Court enter this stipulation and extend all litigation deadlines as outlined above, and continue the Case Management Conference until March 30, 2022, or at such later time as is convenient for the Court.

9. Pursuant to Local Civil Rule 5-1(h)(3), the undersigned counsel for Defendants attest that the other signatories listed below concur in the filing of this document.

Dated: December 17, 2021

s/ Martha C. Mann
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Respectfully submitted,

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Counsel for Plaintiffs

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

DONNA M. RYU
United States Magistrate Judge